

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

Plaintiffs,

v.

PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES; SCOTT BESSANT, SECRETARY OF THE TREASURY; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, DIRECTOR OF THE FINANCIAL CRIMES ENFORCEMENT NETWORK; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

Defendants.

Civil Case No. 5:25-cv-00344-FB

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES

Plaintiffs respectfully request leave to file a reply in support of their motion for a preliminary injunction that exceeds the page limit prescribed by Local Rule CV-7(c)(3) by 10 pages. Plaintiffs have attached the proposed reply to this motion. In support of this motion, Plaintiffs state as follows:

1. On April 18, 2025, Plaintiffs filed a Motion for a Preliminary Injunction. Dkt. No. 22.

2. On May 1, 2025, Defendants filed an unopposed motion to file excess pages, seeking to file a proposed memorandum in opposition to Plaintiffs' motion for a preliminary injunction that exceeded the 20-page limit by 10 pages. Dkt. No. 31. Defendants' motion was granted and their memorandum in opposition to Plaintiffs' motion for a preliminary injunction was docketed on May 5, 2025. Dkt. Nos. 32 & 33.

3. Pursuant to Local Rule CV-7(e)(3), replies are limited to 10 pages, exclusive of the caption, signature block, any certificates, and accompanying documents.

4. Plaintiffs seek the extension for two reasons. First, because it was not clear whether the government would agree not to enforce the challenged Geographic Targeting Order if the TRO expired before the Court could hold a preliminary-injunction hearing, Plaintiffs filed their preliminary-injunction motion *before* the government filed the administrative record. Accordingly, the reply will be Plaintiffs' first opportunity to directly address the Administrative Record. Second, the government sought—and Plaintiffs did not oppose—an extension because of the inherent complexity of this case. As part of that agreement, the government agreed not to oppose Plaintiffs' request for 20 pages.

5. As noted, Plaintiffs' counsel has conferred with Defendants' counsel, who do not oppose this motion.

Dated: May 5, 2025

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Attorneys for Plaintiffs Texas Association for Money Services Businesses (TAMSB); Reynosa Casa De Cambio, Inc.; Nydia Regalado d/b/a Best Rate Exchange; Mario Regalado d/b/a Border International Services; Laredo Insurance Services, LLC; E.Mex. Financial Services, Inc.; R & C, Inc. d/b/a Temex Money Exchange; San Isidro Multi Services, Inc.; Cris Win Inc. d/b/a Brownsville Casa De Cambio; and Espro Investment LLC d/b/a Lonestar Money Exchange

Respectfully submitted,

/s/ Jeffrey Rowes
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Attorneys for Plaintiffs Arnoldo Gonzalez, Jr. and High Value, Inc.

CERTIFICATE OF SERVICE

I certify that on May 5, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Jeffrey Rows
Jeffrey Rows (TX Bar No. 24104956)